PDRSF
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Oregon
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June 26, 2001 *Also sent by e-mail*

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
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RE: Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon
XPA Sampling Results

Dear Mr. Cusma:

Thank you for submitting the Expanded Preliminary Assessment (XPA) data at our June 11, 2001 meeting. The Department of Environmental Quality (DEQ) has reviewed this data summary and has the following comments.

North Area

- Limited sampling along the railroad tracks and yard area showed elevated levels of petroleum and metal contaminants. The three sample locations along the railroad track were selected to represent surface water drainage pathways from the subject site and therefore background railroad contamination cannot be assumed as the source. Data shows that there has been a release, although the extent of contribution from the subject site is not clear.

- The primary migration pathway from the railroad tracks presented in the PA was downward percolation to groundwater. Please provide more details on potential surface water flow west along the railroad tracks and then south to the river along N. Burlington. The metals do not appear leachable in these samples, so metal contamination leaching to groundwater does not appear to be a concern at this location.

Borings

- Analytical results for volatile organic compounds in groundwater were not submitted; please provide this data for DEQ review.

- Groundwater from boring PP-3 showed elevated benzo(a)pyrene and total copper, lead, mercury, and zinc. DEQ recommends that this well be re-sampled for semi-volatile organic compounds and total metals to evaluate this apparent groundwater contamination. The original well development records for PP-3 should be reviewed to determine if adequate development had occurred prior to groundwater sampling; if necessary, further well development should be conducted prior to re-sampling this well.

- An additional soil sample in boring PP-1 should have been collected within the black sand to evaluate the nature and extent of contamination. Comment #5 in DEQ's February 21, 2001 letter suggested that a water table sample be collected to evaluate upgradient historical sources in addition to the proposed black sand sample.

Outfall Pipes

- Lead, mercury, and pyrene concentrations in surface sediment sample SS-6 were elevated above threshold sediment screening criteria. The source of this contamination is not known, and is also present in groundwater immediately upgradient in boring PP-3. Please submit detailed soil descriptions for sample SS-6 and an evaluation of the potential for sediment in this area to migrate to the river.

Black Sand

- Elevated levels of polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls, and chromium, lead, and zinc were observed in the black sand. The proposed removal of black sand is generally acceptable and a removal plan including confirmation sampling and action levels should be submitted for DEQ review.

Metal Debris

- Elevated arsenic, chromium, copper, nickel, and zinc were observed in surface sediment around the metal debris. The proposed removal of metal debris and underlying sediment is generally acceptable and a removal plan including confirmation sampling and action levels should be submitted for DEQ review.

Conclusions

Further evaluation is needed for each of the potential contaminant source areas described above. The black sand appears to be the primary source area of concern, but the other potential source areas require further evaluation of contaminant pathways before these sources areas are eliminated from consideration. Although it is premature for DEQ to make a determination regarding your interest in pursuing "no further action" status for the subject site, it appears that while the data presented may not warrant a "high priority" investigation (except for the black sand area), it is insufficient to adequately evaluate source areas. The XPA sampling plan was designed to primarily evaluate pathways, not sources areas. Therefore, DEQ may make determinations concerning contaminant pathways to the Willamette River with low-medium priority upland issues remaining.

DEQ understands that you plan to conduct re-sampling of PP-3 and black sand reconnaissance by the end of June and would like to discuss analytical results and a black sand removal plan around mid-July. Please call me if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager

cc: Ross Rieke, Bridgewater Group
Rod Struck, DEQ/NWR